



OMB Control No. 2060-0161
Approval expires 03/31/2019

OMB Control No. 2060-0693
Approval expires 03/31/2019

30-DAY NOTIFICATION

2015 CLEAN AIR ACT (CAA) STANDARDS OF PERFORMANCE FOR NEW RESIDENTIAL WOOD HEATERS, NEW RESIDENTIAL HYDRONIC HEATERS AND FORCED-AIR FURNACES 40 CFR PART 60 SUBPARTS AAA AND QQQQ

The public reporting and recordkeeping burden for this collection of information is estimated to average 2 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Regulatory Support Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Disclaimer: The statutory provisions and the EPA regulations described in this document contain legally binding requirements. This document is not a substitute for those provisions or regulations, nor is it a regulation itself. In the event of a discrepancy, please refer to 40 CFR PART 60 Subparts AAA AND QQQQ, sections 60.537 and 60.5479. If you have additional questions, please contact Rafael Sanchez at 202-564-7028 or via email at sanchez.rafael@epa.gov.

Instructions: The manufacturer of an affected wood/pellet heater/central heater model line must notify the Administrator of the date that certification testing is scheduled to begin by email to WoodHeaterReports@epa.gov. This notice must be received by the EPA at least 30 days before the start of testing.

GENERAL INFORMATION						
Manufacturer's Name: Liberator LLC						
Heater Type (Circle One):	<input type="checkbox"/> Adjustable Burn Rate Wood Heater	<input checked="" type="checkbox"/> Pellet Stove	<input checked="" type="checkbox"/> Single Burn Rate Heater	<input type="checkbox"/> Hydronic Heater	<input type="checkbox"/> Forced Air Furnace	<input type="checkbox"/> Other:
Hydronic Heater Type (Check one):	<input type="checkbox"/> Full Storage	<input type="checkbox"/> Partial Storage	<input type="checkbox"/> Indoor	<input type="checkbox"/> Outdoor	<input type="checkbox"/> Other:	
Forced-Air Furnace Type (Check one):	<input type="checkbox"/> Small (less than 65,000 BTU/hr heat output)		<input type="checkbox"/> Large (greater than 65,000 BTU/hr heat output)			
Fuel Tested (Check one):	<input type="checkbox"/> Crib	<input checked="" type="checkbox"/> Pellet	<input type="checkbox"/> Cordwood	<input type="checkbox"/> Wood Chips	<input type="checkbox"/> Other:	
Model Name(s) (as will appear on test report): Liberator						
Model Number(s) (as will appear on test report): RMH-2						
Equipped with a catalytic combustor? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No						
Mailing Address: 350 Farris Spur Rd						
Street Address: Same						



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City: Bourbon	State: MO	ZIP Code: 65441
Phone: 314-770-1043	Fax:	Web Site: www.rocketheater.com
Address of Manufacturer: 350 Farris Spur		
City: Bourbon	State: MO	ZIP Code: 65441
EPA APPROVED TEST LABORATORY		
Name and Title of Authorized Representative: Sebastian Button, Laboratory Manager		
Company: PFS TECO		
Phone: 503-650-0088	E-mail: Sebastian.button@pfsteco.com	Fax:
City: Clackamas	State: OR	ZIP Code: 97015
EPA APPROVED THIRD-PARTY CERTIFIER		
Name and Title of Authorized Representative: Laura Hinton, Inspection Supervisor		
Company: Guardian Test Labs		



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Phone: 315-754-4934	E-mail: lhinton@guardiantestlabs.com	Fax:
City: Cobleskill	State: NY	ZIP Code: 12043
COMPLIANCE TEST INFORMATION		
Test Method(s): ASTM E2515, ASTM E2779 – Single Burn Rate Appliance per approved ATM (Attached) . Efficiency per CSA B415.1-10		
Date(s) of Proposed Test: Week of 11/04/2021		
Testing Location: PFS TECO 11785 SE HWY 212 Clackamas, OR 97015		



United States
Environmental Protection
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HUDDESTON, SKY M. CEO

Print Name and Title of Authorized Official



Signature

9-29-2021

Date

Telephone Number: 577-468-4043

Email Address: smhuddleston@rocke+mail.com

Remarks:

v1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Sky Huddleston
Liberator LLC
350 Farris Spur
Bourbon, MO 65411

09/09/2021

Dear Mr. Huddleston,

I am writing in response to the request, dated August 2, 2021, from John Steinert of PFS-TECA on your behalf regarding certification testing of your Liberator Rocket Model RMH-2 pellet fuel heater. You are planning to demonstrate compliance with 40 CFR 60, Subpart AAA - Standards of Performance for New Residential Wood Heaters (Subpart AAA) using the test method ASTM E2779-10 "Standard Test Method for Determining Particulate Matter Emissions from Pellet Heaters." You are requesting an alternative certification testing procedure for your RMH-2 pellet heater because it cannot meet the consecutive high, medium, and low burn rate requirements as specified in ASTM E2779-10, Section 9.4.1.2, Table 1.

In your correspondence, you state that the RMH-2 is a single burn rate pellet heater that is gravity fed with no blower and can only be operated at a single burn rate. You mention that ASTM E2779-10 requires testing at three consecutive burn rates, a high burn rate for 1 hour, a medium burn rate for 2 hours, and a low burn rate for 3 hours for a total test time of 6 hours. You state that ASTM E2779-10 does not have a provision for single burn rate appliances, therefore, you propose to operate the RMH-2 heater at the single burn rate for a total of 6 hours as required in ASTM E2779-10 with no other changes to the method.

With the caveats set forth below, we are approving your alternative method request for certification testing of the Liberator Rocket Model RMH-2 pellet heater at the single burn rate for a total test time of 6 hours. This approval is based on the understanding that the RMH-2 design incorporates only one setting, which is the lowest heat output (Btu/hr) setting available to the user, and corresponds to the lowest burn rate to be evaluated during certification testing; this is consistent with 40 CFR part 60, Subpart AAA, section 60.534, which states: "The burn rate for the low burn category must be no greater than the rate that an operator can achieve in home use and no greater than is advertised by the manufacturer or retailer."

As required in Subpart AAA, section 60.534(d), the manufacturer/approved test laboratory must also measure the first hour of particulate matter emissions for each test run using a separate set of filters in one of the two parallel sampling trains. These results must be reported separately and also included in the total particulate matter emissions per run. Also, as required in Subpart AAA, section 60.534(e), the manufacturer/approved test laboratory must measure the efficiency, heat output, and carbon monoxide emissions of the tested wood heater using CSA Method B415.1-10. Disregard sections 8.3.1 and 8.4 in CSA Method B415.1-10 regarding the use of Douglas fir

lumber in a crib wood configuration for this testing. For particulate matter emission concentrations, ASTM E2515-11 "Standard Test Method for Determination of Particulate Matter Emissions Collected by a Dilution Tunnel" must be used; four inch filters are acceptable.


The following changes to ASTM E2515-11 must be followed for the certification testing:

1. Filters must be weighed in pairs (**front and rear filters together**) to reduce weighing error propagation. See ASTM E2515-11, Section 10.2.1, Analytical Procedure.
2. Sample filters must be Pall TX-40 or equivalent Teflon-coated glass fiber filters, and 47 mm, 90 mm, 100 mm, or 110 mm in diameter.
3. Only one point is allowed outside the +/- 10 percent proportionality range per test run.

A copy of this letter must be included in each certification test report. The emission limit in the rule remains intact and time weighted averaging is not allowed. This alternative method approval is valid until such time that Subpart AAA is revised or replaced to require a different certification method for these units, and at such time, this alternative will be reconsidered and possibly withdrawn.

If you have additional questions regarding this approval, please contact Michael Toney of my staff at 919-541-5247 or toney.mike@epa.gov.

Sincerely,


Steffan M. Johnson, Group Leader
Measurement Technology Group

cc: Rochelle Boyd, EPA/OAQPS/SPPD
Angelina Brashear, EPA/OAQPS/AQAD
Chuck French, EPA/OAQPS/SPPD
Rafael Sanchez, EPA/OECA
Michael Toney, EPA/OAQPS/AQAD